UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD REGION 7

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) Case Nos.	
)	7-CA-132729
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MOTION FOR AN EXTENSION OF TIME TO FILE POST-HEARING BRIEFS

COMES NOW, Detroit Newspaper Partnership ("DNP") and Detroit Free Press ("DFP"), pursuant to Section 102.42 of the National Labor Relations Board's Rules and Regulations, Series 8, as amended, with this MOTION FOR AN EXTENSION OF TIME TO FILE POST-HEARING BRIEFS. Currently, the post-hearing briefs in the instant case are due on March 23, 2015. DNP and DFP respectfully request an extension until **April 8, 2015** for all parties to file the post-hearing briefs in the instant cases.

DNP and DFP make this request for the following reasons:

- 1. Counsel to DNP and DFP has a separate NLRB hearing (04-CA-121323) scheduled for March 23, 2015 (Attachment 1);
- 2. Counsel has just returned from the annual ABA Committee on Practice and Procedure before the NLRB mid-winter conference;
- 3. Counsel has an unemployment hearing in Buffalo, New York on March 31, 2015;

- 4. The Easter holiday weekend is April 5, 2015.
- 5. The Charging Party will incur no greater harm if this extension is granted.

This request is not made for the purposes of delay; rather it is made to devote adequate resources to preparing the brief in the instant cases.

DNP and DFP have conferred with Counsel for the General Counsel, Counsel to the Charging Party, and Counsel to The Detroit News. All parties have permitted DNP and DFP to represent that each does not oppose this request for an extension.

CONCLUSION

WHEREFORE, for the reasons explained herein, DNP and DFP respectfully request an extension of time, until **April 8, 2015**, for all parties to submit post-hearing briefs in the above-referenced cases.

DATED:

March 9, 2015

Nashville, Tennessee

Respectfully Submitted,

THE ZINSER LAW FIRM, P.C.

L. Michael Zinser

Glenn E. Plosa

414 Union Street, Suite 1200

Nashville, Tennessee 37219

Telephone 615.244.9700

Facsimile 615.244.9734

CERTIFICATE OF SERVICE

I hereby certify that the foregoing MOTION FOR AN EXTENSION OF TIME TO FILE POST-HEARING BRIEFS was filed via electronic filing this 9th day of March, 2015, with the NLRB Division of Judges and served, via overnight Federal Express, on the following:

Terry A. Morgan, Regional Director Ingrid L. Kock, Counsel for the General Counsel National Labor Relations Board Region 7 477 Michigan Avenue, Room 300 Detroit, Michigan 48226-2543

Duane F. Ice, Esq. (Attorney for Local 34022) Law Office of Duane F. Ice, P.C. 267611 Woodward Avenue Huntington Wood, MI 48070-1332

Robert M. Vercruysse, Esq. (Attorney for *The Detroit News*) Vercruysse, Murray and Calzone, PC 31780 Telegraph Road, Suite 200 Bingham Farms, MI 48025-3469

Glenn E. Plosa

Attachment 1

UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD REGION FOUR

GANNETT PUBLISHING SERVICES

And

Case 04-CA-121323

NEWSPAPER & MAGAZINE EMPLOYEES UNION TEAMSTERS LOCAL 1414

ORDER RESCHEDULING HEARING

IT IS HEREBY ORDERED that the hearing in the above-entitled matter is rescheduled from 10:00 a.m. on February 9, 2015 to 10:00 a.m. on March 23, 2015 at the Regional Office, 615 Chestnut Street, Suite 710, Philadelphia, Pennsylvania. The hearing will continue on consecutive days until concluded.

Signed at Philadelphia, Pennsylvania on 29th day of December, 2014.

HAROLD A. MAIER

Acting Regional Director, Fourth Region

National Labor Relations Board